

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA,

PLAINTIFF,

CRIMINAL NO. 24-MJ-30012

v.

SEAN JENKINS JR.,

Defendant.

**MOTION AND BRIEF FOR LEAVE TO
DISMISS COMPLAINT WITHOUT PREJUDICE**

Pursuant to Rule 48(a) of the Federal Rules of Criminal Procedure, the United States of America hereby moves for leave to dismiss without prejudice the complaint against Defendant Sean Jenkins Jr.. In this case, the government needs additional time to decide whether criminal prosecution of defendant for the offense in question is in the public interest. *See generally United States v. Lovasco*, 431 U.S. 783, 790-96 (1977); 18 U.S.C. § 3161(d)(1). The government's ability to prosecute this case properly would be substantially impaired were it required to proceed to indictment or information within the 30-day period prescribed by the Speedy Trial Act, *see* 18 U.S.C. §§ 3161(b), 3161(h). Accordingly, the government requests leave to dismiss the complaint without prejudice.

Respectfully submitted,

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Dated: June 28, 2024

CERTIFICATE OF SERVICE

I hereby certify that on Friday, June 28, 2024, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

s/Barbara Lanning

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